

JAP:MKP

15 M 1040

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

IVAN RODRIGUEZ,

Defendant.

-----X

EASTERN DISTRICT OF NEW YORK, SS:

JOSEPH PISCIOTTA, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about October 30, 2015, within the Eastern District of New York and elsewhere, the defendant IVAN RODRIGUEZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and belief are as follows:¹

1. On or about October 30, 2015, the defendant IVAN RODRIGUEZ arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard Jetblue flight no. 436 from Santiago, Dominican Republic.

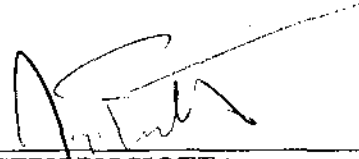
¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. Upon his arrival at JFK, the defendant IVAN RODRIGUEZ was selected for an examination by United States Customs and Border Protection ("CBP"). The defendant presented a blue "New Way" suitcase for inspection. When asked by a CPB officer if the bag and contents of the bag were his, the defendant answered in the affirmative and said that he had packed the bag himself. The inspection revealed that the suitcase was unusually heavy and thick on the bottom. The inspection revealed that the suitcase had a false bottom and underneath was a thin package. When the package was probed it revealed a white powdery substance, which was field-tested positive for cocaine. The gross weight of the cocaine was approximately 644 grams.

3. After his arrest the defendant was read his Miranda rights which he waived, and he agreed to speak with HSI agents without an attorney present. During that conversation the defendant admitted he knew he was transporting cocaine and that he expected to be paid \$7,000.


WHEREFORE, your deponent respectfully requests that the defendant
IVAN RODRIGUEZ be dealt with according to law.

Dated: Brooklyn, New York
October 30, 2015



JOSEPH PISCIOTTA
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
30th day of October, 2015



S/ Marilyn Go
THE HONORABLE MARILYN D. GO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK